



NH DEPT OF
ENVIRONMENTAL SERVICES

JUL -9 2008

RECEIVED

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July 8, 2008

Thomas S. Burack, Chairman
New Hampshire Site Evaluation Committee
29 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095

**Re: Docket No. SEC 2008-02 - Application of Tennessee Gas Pipeline Company
For a Certificate of Site and Facility Concord Lateral Expansion Project**

Dear Chairman Burack:

We would like the record to reflect that we caused the Tennessee Gas Pipeline Company filing of July 7 (a copy of which is enclosed) to be mailed to everyone on the service list on that date.

If you have any questions, please have your staff call me.

Sincerely yours,

Donald J. Pfundstein

DJP/skr

Enclosure

cc: Carol M. Desrosiers
Service List

July 7, 2008

NH DEPT OF
ENVIRONMENTAL SERVICES

JUL -9 2008

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Mr. Thomas S. Burack, Chairman
New Hampshire Site Evaluation Committee
c/o New Hampshire Department of Environmental Services
29 Hazen Drive
P. O. Box 95
Concord, New Hampshire 03302-0095

In re: Tennessee Gas Pipeline Company
Concord Lateral Expansion Project
Docket No. 2008-002

Dear Mr. Burack:

Tennessee Gas Pipeline Company ("Tennessee") received Carol M. Desrosiers' letter dated June 18, 2008, to New Hampshire Site Evaluation Committee ("NH SEC") regarding her concerns about Tennessee's Concord Lateral Expansion Project ("Project"). In an effort to acknowledge and address Ms. Desrosiers' concerns, Tennessee hereby supplements its NH SEC filing with the following information:

Ms. Desrosiers' letter predates Tennessee's June 24, 2008, response to the Federal Energy Regulatory Commission ("FERC") that discusses many of her concerns. A copy of that response is attached. Tennessee remains willing to further discuss the Project with Ms. Desrosiers if she would find that beneficial.

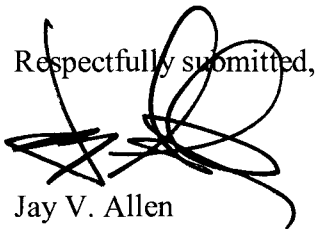
Regarding Ms. Desrosiers' reference to the FERC's Environmental Assessment's ("EA") discussion of the sound impacts of the Project, on June 9, 2008, Tennessee filed comments noting that the table and references to the noise sensitive areas ("NSA") were incorrect and included a revised table indicating the discrepancies between what was in the EA and what was originally provided in Tennessee's environmental report. All of the NSAs discussed in Tennessee's report were within a 200 meter (a little over one tenth of a mile) range. The EA's statement that there is "a large increase in ambient noise up to almost a mile from the compressor station" is attributable to the erroneous data. A copy of Tennessee's filing to FERC noting this error is attached.

In addition, the section of Ms. Desrosiers' comments titled "Noise Can Be Mitigated Effectively" included recommendations of mitigation measures that Tennessee could implement to reduce sound impacts. Tennessee has already committed to undertaking these mitigation measures. On April 14, 2008, Tennessee filed responses to a FERC data request outlining what additional measures it planned in order to further mitigate potential sound impacts and reiterated these measures in its aforementioned and attached June 24, 2008, filing with the FERC.

Mr. Thomas S. Burack, Chairman
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Tennessee is taking all practical measures to be the “good neighbor” in the community as Ms. Desrosiers references in her closing paragraph.

On June 18, 2008, Tennessee sponsored a bus trip to visit a similar station allowing interested abutters and town officials an opportunity to experience firsthand what a compressor station looks and sounds like. During the trip, Tennessee provided an overview of the Project and responded to questions posed by the five parties in attendance. An additional opportunity to learn more about the Project will be provided on July 17, 2008, at the NH SEC scheduled public information hearing at the Pelham Elementary School, as well as the site visit to the location of the planned Project compressor station. Tennessee encourages anyone interested in learning about the Project to attend these events.

Respectfully submitted,

Jay V. Allen
Senior Counsel

c: Ms. Carol M. Desrosiers

June 24, 2008

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Tennessee Gas Pipeline Company
Concord Lateral Expansion Project
Docket No. CP08-65-000

Dear Ms. Bose:

On January 30, 2008, Tennessee Gas Pipeline Company ("Tennessee") filed an application with the Federal Energy Regulatory Commission ("Commission") for authorization to construct a 6,130 horsepower compressor station on its Line 200 system in Pelham, Hillsborough County, New Hampshire ("Project"). Tennessee hereby supplements its application with information regarding additional outreach efforts and with information relating to comments of landowners Carol M. Desrosiers and Christopher Hebert that were recently filed with the Commission.

Carol M. Desrosiers

On June 18, 2008, Ms. Desrosiers filed comments relating to Tennessee's failure to inform her of the Project, the location of the industrial park in which the compressor station is to be sited, and noise impacts.

Non-Notification

Tennessee's records inadvertently and incorrectly showed the owner of 88 Mammoth Road to be the owners of the Whispering Winds complex (i.e. Windham Meadows, LLC, with a mailing address of 1 Pleasant Street, Windham). For this reason, Tennessee's notice for this property was sent to the wrong address. Tennessee's records regarding 84 and 86 Mammoth Road were also incorrect. Because Tennessee did not receive any of the notices via return mail, it was unaware of the error until Ms. Desrosiers brought it to Tennessee's attention.

Upon learning of this error, on June 17, 2008, a Tennessee representative hand carried copies of the original notice and the Commission's most recent landowner pamphlet "An Interstate Natural Gas Facility on My Land? What Do I Need to Know?" Tennessee apologized for the oversight and assured Ms. Desrosiers that she would be included on any future mailings.

Industrial Park Issues

Ms. Desrosiers states that the Town of Pelham has located an industrial park at the end of its border, which encroaches upon the Town of Hudson and the Town of Windham. Tennessee understands that the Town of Pelham has the right to zone property within the bounds of its township as it deems appropriate for the circumstances. Further, Tennessee believes that its property lies entirely within the bounds of the Town of Pelham and does not physically extend into any other townships.

Noise

Noise from compressor stations is regulated under Part 380 – Regulations Implementing the National Environmental Policy Act (18 CFR 380.1). This carefully crafted federal regulation, which is applied through the United States, sets a maximum limit for noise generated by a new or modified compressor station to an L_{dn} of fifty-five dBA at any pre-existing noise sensitive areas (“NSAs”) such as schools, hospitals, or residences. For sound sources that operate continuously over a twenty-four hour period, a fifty-five L_{dn} is equivalent to both a twenty-four hour and one hour L_{eq} of 48.6 dBA. Resource Report 9 of the environmental report filed with Tennessee’s application included results from a pre-construction sound survey and noise modeling analysis (“Analysis”) that was conducted for the Project. The Analysis showed that all NSAs considered in the Analysis, including all of those who have commented, will comply with the required dBA L_{dn} noise criteria limit.

Tennessee purposely designed the compressor station to reduce the potential for adverse noise impacts at the NSA locations, including Whispering Winds, represented in the Assessment as NSA 1, and Ms. Latour, who is located southeast of NSA 4 (See attached Figures A1 through A3). In screening for, and ultimately selecting, an appropriate site for the compressor station, Tennessee purposely selected a pre-designated industrial location. The currently predicted levels in the environmental report take into account many proactive and voluntary mitigation measures by Tennessee to reduce the noise levels. Tennessee intends to install noise insulation panels in the compressor building, VFD motors on the gas coolers, compressor and generator exhaust mufflers, and pipe silencing (blankets or burying of pipe) in order to try to attain the predicted levels. Tennessee continues to explore additional measures for noise mitigation with its noise consultant, but has not identified any other reasonable measures that would provide additional mitigation at this time. Given the nature of noise modeling and prediction, however, Tennessee is only able to guarantee that it will meet the 55 dBA requirements. Ultimately, the Project will comply with the applicable regulatory noise criteria at all existing potentially sensitive receptors.

During the aforementioned discussion between the Tennessee representative and Ms. Desrosiers on June 17, 2008, Ms. Desrosiers was invited to attend a bus trip for the following evening, sponsored by Tennessee, to take interested residents in Windham and Pelham to a similar existing Tennessee installation so that the residents could visually observe and listen to an operating station. Ms. Desrosiers declined Tennessee’s invitation.

Christopher Hebert:

On June 17, 2008, J. Gregory Batten, attorney for Mr. Hebert, whose property abuts the compressor station site, filed comments on the Environmental Assessment ("EA") issued by the Commission on May 12, 2008, for the Project. Tennessee provides the following information in response to Mr. Hebert's comments:

1. Regarding the statement in the EA that the "proposed facility would be located in an area where the adjacent properties are zoned as industrial (Pelham Industrial Park) and are characterized as open land," Mr. Hebert points out that this information is incorrect. Tennessee acknowledged this, and on June 10, 2008, filed supplemental comments to the EA stating that it had inadvertently used such language to describe the location of its property in Resource Report 1 of the environmental report that accompanied Tennessee's application for the Project. In its June 10 filing, Tennessee provided a more accurate description for its property, as well as the adjacent properties. Please refer to Tennessee's filing for the amended language.
2. Mr. Hebert is concerned that the use of blasting was not fully addressed in the EA. More specifically, Mr. Hebert questions who will be responsible for damages that may occur to his home, which is located approximately 600 feet from the site of the stack associated with the compressor station, if blasting is used. As stated in the referenced environmental report and reiterated in the EA, Tennessee does not believe that blasting will be required at this location. However, if requested in writing by Mr. Hebert, Tennessee is willing to perform a pre-construction survey of Mr. Hebert's structure to document its condition. If blasting is subsequently required, Tennessee will also perform a post-construction survey of said property and compensate Mr. Hebert for any damages reasonably and directly attributable to such blasting.
3. Mr. Hebert questions the reference to a "recently approved two-lot subdivision," asking if this description refers to his property and his brother's property, which adjoins his property and abuts the compressor station property. Mr. Hebert notes that if the reference is to his and his brother's properties that it is inaccurate. Mr. Hebert advises "each lot contains a single family residence, i.e., Mr. Hebert's home is on one lot and his brother's home is on the other." The reference to the "recently approved two-lot subdivision" was taken from Resource Report 8 of the environmental report. Tennessee obtained this description of the property from the Pelham Planning Board on January 4, 2008. The Planning Office Manager stated that a "two lot subdivision has recently been approved on lot 5-124, which abuts the Compressor Station 270B property to the south (east of the existing transmission line Right-of-Way). An approximately one acre lot was created in the southeast corner of the parent lot. The newly created lot contains one residential dwelling." Tennessee understands the lots referenced by the planning office manager are the Heberts'.

Further Outreach Efforts

As referenced above, Tennessee offered residents of the areas near the Project facilities an opportunity to visit, using transportation provided by Tennessee, a Tennessee compressor station that was generating sound levels similar to what is anticipated to be produced by the Project facilities. The tour was conducted on June 18, 2008, with five residents attending – Christopher and Kevin Hebert, Bill Fitzgerald, and Joan LaTour and her granddaughter Tiffany. The destination was a comparably sized, operating compressor station in Mendon, Massachusetts. The bus stopped approximately 600 feet from the compressor station. That distance approximates a comparable distance to what would be the nearest abutter to the Project's station. At that distance, the primary noise was an air conditioning unit at a nearby residence. The residents and Tennessee staff walked approximately 300 feet closer to the station to verify it was actually operating. The group remained at the site for approximately thirty minutes conducting conversational exchanges at normal speaking levels before returning to Pelham, New Hampshire.

Prior to filing its application for the Project with the Commission, Tennessee's outreach efforts included a meeting with officials from the Town of Pelham on December 18, 2007, and a meeting with the Town Manager of the Town of Windham on January 22, 2008, advising of the Project and responding to questions raised by residents of Windham who attended the Windham meeting. Tennessee also met with town officials with the City of Concord on January 31, 2008. In addition, Tennessee met with the New Hampshire Public Utility Commission on April 10, 2008, to discuss its participation in New Hampshire's EFSEC process for which Tennessee filed an application on April 22, 2008.

Tennessee trusts that the foregoing comments adequately address the issues raised by Ms. Desrosiers and Mr. Hebert.

Respectfully submitted,

TENNESSEE GAS PIPELINE COMPANY

By

Jay V. Allen

Senior Counsel

(713) 420-5589

(713) 420-1601 (fax)

c: David Hanobic (FERC Staff)
all parties

June 9, 2008

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First St., N.E., Room 1A
Washington, D.C. 20426-0002

Re: Tennessee Gas Pipeline Company
Concord Lateral Expansion Project – Environmental Assessment
Docket No. CP08-65-000

Dear Ms. Bose:

Pursuant to the Federal Energy Regulatory Commission's ("Commission") Environmental Assessment's ("EA") public comment period, Tennessee Gas Pipeline Company ("Tennessee") hereby submits the following comments on the EA:

Section B. Environmental Analysis, Paragraph 7.2 Noise. Table 9 identifies the NSAs as 1, 2, 3, and 5; where the Resource Report listed NSAs 1, 2, 3, and 4. Additionally, the distances listed in the EA for the NSAs are incorrect. Below is a table demonstrating the discrepancies:

Resource Report 9 Table 1 & 2 Measurement Location	Resource Report 9 Table 1 & 2 Distance(m) and Direction	Resource Report 9 Table 1 & 2 Distance(ft) and Direction	Environmental Assessment Table 9 Measurement Location	Environmental Assessment Table 9 Distance (ft) and Direction
1	210 m N	688 ft N	1	660 ft N
2	208 m NE	682 ft NE	2	2,888 ft NE
3	197 m E	646 ft E	3	4,189 ft E
4	181 m SE	593 ft SE	5	1,950 ft SE

Section D. Conclusions and Recommendations, Paragraph 10. Tennessee recommends that the Commission substitute the following in place of the current language in Paragraph 10:

Tennessee shall develop a landscaping and site screening plan for Compressor Station 270B1. The plan shall include specific measures to minimize visual impacts of the compressor station including additional vegetative screening. Tennessee shall file a copy of this landscaping and site screening plan for review and comments by the Director of OEP.

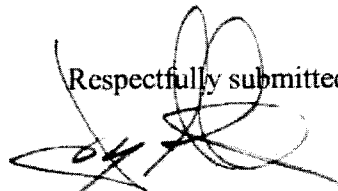
Section D. Conclusions and Recommendations, Paragraph 12. Tennessee has not identified any local, state, or federal regulations for intermittent noise sources similar to the blowdown vent silencer. In order to make a reasonable effort to minimize the impact of blowdown events on our neighbors, Tennessee voluntarily plans to install a silencer on the blowdown vent. Because this is not a normal operational event, Tennessee does not believe that modeling this noise source provides any value and is concerned about potential arbitrary treatment of this information given the lack of any guidelines. Tennessee therefore respectfully requests that the Commission not impose additional modeling or formal approval requirements on Tennessee relative to this voluntary installation. Prior to construction, Tennessee will submit for review and comment the design specification of the blowdown vent silencer.

Section D. Conclusions and Recommendations, Paragraph 13. To make such recommendation consistent with the application regulations, Tennessee recommends that the Commission substitute the following in place of the current language in Paragraph 13:

Tennessee shall make all reasonable efforts to ensure a noise level of 55 dBA L_{dn} from Compressor Station 270B1 is not exceeded at any of the NSAs and shall file noise surveys with the Secretary **no later than 60 days** after placing the Compressor Station in service. If the noise attributable to the operation of the Compressor Station at full load exceeds 55 dBA L_{dn} at any nearby NSAs, Tennessee should file a report on what changes are needed and should install additional noise controls to meet the level **within 1 year** of the in-service date. Tennessee should confirm compliance with these requirements by filing a second noise survey with the Secretary **no later than 60 days** after it installs the additional noise controls.

A copy of this letter has been served on all parties on the Commission's official service list. If you have any questions regarding these comments or the Project, please call me at 713-420-5589.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jay V. Allen", is written over the typed name and title.

Jay V. Allen
Senior Counsel

c: Mr. David Hanobic, FERC Staff
all parties

SERVICE LIST
(Updated June 24, 2008)

Docket No. 2008-002.

Application of Tennessee Gas Pipeline Co.

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